

ASL SERVICES HOLDINGS, LLC.

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Via ECFS and Overnight Delivery

April 16, 2012

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FCC Mail Room

Ms. Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

445 12th Street, S.W.

Washington, D.C. 20554

RE: *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities E911 Requirements for IP-Enabled Service Providers*, Docket Nos. CG Docket No. 03-123 and WC Docket No. 05-196, Mandatory Minimum Standards Waiver Annual Report

Dear Ms. Dortch:

Pursuant to the Federal Communications Commission's 2011 VRS Waiver Extension Order¹ in the above-referenced proceedings, ASL Services Holdings, LLC ("ASL," branded "Gracias VRS"), submits its initial annual report regarding Mandatory Minimum Standards ("MMS") currently waived for Video Relay Services ("VRS") and Internet Protocol ("IP") Relay services.²

A certified Statement of Compliance regarding the accuracy of this report is attached. Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,



ASL SERVICES HOLDINGS, LLC

Angela Roth

President and Chief Executive Officer

Attachment

¹ *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities E911 Requirements for IP-Enabled Service Providers*, Docket Nos. CG Docket No. 03-123 and WC Docket No. 05-196, Order, DA 11-1159, 26 FCC Rcd 9449, (June 30, 2011) [2011 VRS Waiver Extension Order].

² ASL does not provide IP Relay services

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ASL Services Holdings, LLC
2012 Annual Mandatory Minimum Standards Waiver Compliance Report
CH Docket No. 03-123

I. Introduction

The following constitutes ASL Services Holdings, LLC (“ASL,” branded “Gracias VRS”), initial annual report regarding Mandatory Minimum Standards (“MMS”) currently waived for Video Relay Services (“VRS”) and Internet Protocol (“IP”) Relay services,³ submitted pursuant to the Commission’s *2011 VRS Waiver Extension Order*. ASL maintains that it has the technical capability to comply with the waived MMS, though has yet to experience any calls to which the waived MMS apply. ASL addresses the specific issues on which the Commission requests comment for each waived MMS.

II. ASL Compliance With Waived Mandatory Minimum Standards

1. One-line VCO, VCO-to-TTY, and VCO-to-VCO.⁴

The Commission inquires whether it is necessary for this waiver to remain in effect, and whether a technical fix is imminent. ASL currently maintains the ability through its automatic call distribution platform to process these calls, though has received no such calls entailing these call types. ASL does not require a waiver to comply.

2. One-line HCO, HCO-to-TTY, and HCO-to-HCO.⁵

The Commission inquires whether it is necessary for this waiver to remain in effect. ASL currently maintains the ability through its automatic call distribution platform to process these calls, though has received no such calls entailing these call types. ASL does not require a waiver to comply.

³ ASL does not provide IP Relay services

⁴ “One-line HCO is a type of traditional TTY-based TRS that can be used by persons with a speech disability but who can hear. The HCO user types what he or she wishes to say to the called party, and the CA voices what the HCO user has typed. The HCO user then listens to what the called party says in response. As a result, the CA does not type any part of the conversation....A VCO-to-TTY call allows a relay conversation to take place between a VCO user and a TTY user; a VCO-to-VCO call allows a relay conversation to take place between two VCO users.”

⁵ “One-line HCO is a type of traditional TTY-based TRS that can be used by persons with a speech disability but who can hear. The HCO user types what he or she wishes to say to the called party, and the CA voices what the HCO user has typed. The HCO user then listens to what the called party says in response. As a result, the CA does not type any part of the conversation....n HCO-to-TTY call allows a relay conversation to take place between an HCO user and a TTY user; an HCO-to-HCO call allows a relay conversation to take place between two HCO users.”

3. *Call Release.*⁶

The Commission inquires whether it is necessary for this waiver to remain in effect. ASL currently maintains the ability through its automatic call distribution platform to process these calls, though has received no such calls entailing these call types. ASL does not require a waiver to comply.

4. *Pay-Per-Call (900) calls.*⁷

The Commission inquires whether it is necessary for this waiver to remain in effect. ASL currently maintains the ability to process pay-per-call calls and has developed procedures to do so, though has received no such calls entailing these call types. ASL does not require a waiver to comply.

5. *Types of Calls (Operated Assisted Calls and Long Distance Calls).*⁸

The Commission inquires whether it is necessary for this waiver to remain in effect. ASL does not charge subscribers to place calls, consistent with the basis for Commission waiver. ASL has implemented procedures to process such calls and does not require a waiver to comply.

6. *Equal Access to Interexchange Carriers.*⁹

The Commission inquires whether it is necessary for this waiver to remain in effect. ASL does not charge subscribers to place calls, consistent with the basis for Commission waiver, as noted. ASL does not require a waiver to comply. The Commission also requests that providers specifically address the effect of the numbering and registered location requirements on the continuing need for this waiver. ASL maintains that the Commission's ten digit assignment requirements and underlying registered location requirements, effectively moot equal access to interexchange carrier requirements as each provider becomes its subscriber's default provider. Further, as no cost to the end user applies, it is unclear why a caller would require equal access to any carrier. Nevertheless,

⁶ "Call release allows a CA to set up a TTY-to-TTY call that, once established, does not require the CA to relay the conversation. This feature allows the CA to sign-off or be "released" from the telephone line, without triggering a disconnection between two TTY users, after the CA connects the originating TTY caller to the called party's TTY through, e.g., a business switchboard. The Commission waived this requirement for VRS and IP Relay."

⁷ "Pay-per-call (900) calls are calls wherein the caller pays for the call at a charge greater than the basic cost of the call. The Commission waived this requirement for VRS and IP Relay."

⁸ "Commission rules require TRS providers to handle any type of call normally handled by common carriers. The requirements that VRS providers offer operator-assisted calls and bill certain types of calls to the end user were waived because providers could not determine if a VRS call was local or long distance. VRS providers are required to allow calls to be placed using calling cards and/or provide free long distance during the waiver period."

⁹ The TRS rules require that providers offer TRS users their interexchange carrier of choice to the same extent that such access is provided to voice users. The Commission has waived this requirement for VRS providers, noting that it was not possible to determine if a call is long distance and, in any event, the providers could not automatically route the calls to the caller's long distance carrier of choice.

should a caller request a specific long distance provider, ASL has the capability to route a call to a carrier using the carrier's network ("dial around") code on a non-presubscribed basis.

7. *Speech-to-Speech.*¹⁰

The Commission inquires whether it is necessary for this waiver to remain in effect. ASL currently maintains the ability through its automatic call distribution platform to process these calls, though has received no such calls entailing these call types, and does not envision receiving such calls. ASL does not require a waiver to comply.

8. *Waiver for Default Providers Using Other Providers' CPE*

In its comments on the Commission's recent *Further Notice of Proposed Rulemaking*¹¹ ASL noted *inter alia* that some dominant provider's equipment is effectively non-interoperable, noting, "[s]ubscribers ultimately fear relinquishing the equipment and serving provider, on the perception that they will lose critical service capabilities and features. This constitutes an anti-discriminatory lock on a dominant provider's subscribers contrary to the Commission's requirements."¹² ASL has supported the Commission's desire to institute technical standards and reiterates its support here. Equipment interoperability is essential to the public's ability to select among service providers consistent with equal access in the wireline and wireless industries.

The Commission notes that this waiver is granted for default Internet-based TRS providers that are unable to meet such standards for newly-registered Internet-based TRS users who port their Customer Premises Equipment ("CPE") from a former default provider. Though the waiver remains warranted to account for such a situation, ASL maintains that the waiver should be finite, thus compelling all manufacturers to have interoperable equipment, designed under Commission technical standards.

¹⁰ The Commission waived this requirement indefinitely for VRS, noting that STS is a speech-based service, whereas VRS is a visual service using interpreters to interpret in sign language over a video connection.

¹¹ *In the Matter of Structure and Practices of the Video Relay Service Program Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, *Comments of ASL Services Holdings, LLC* (March 9, 2012).

¹² *Id.* at page 16.

STATE OF FLORIDA

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COUNTY OF OSCEOLA

STATEMENT OF COMPLIANCE

I swear under penalty of perjury that I am Angela Roth, first being duly sworn upon oath, depose and say I am President and Chief Executive Officer of ASL Services Holdings, LLC, an officer of the above-named reporting entity and that I have examined the foregoing Mandatory Minimum Standards Waiver Annual Report for 2012 and that all requested information has been provided and all statements of fact are true and accurate

ASL Services Holdings, LLC

By:



Angela Roth


President and Chief Executive Officer

3700 Commerce Blvd., Suite 216

Kissimmee, Florida 34741

Telephone: 407.518.7900 ext. 201

Subscribed and sworn to before me this 16 day of April, 2012


Notary Public in and for the State of Florida